



P. Lavi

10 Auserehl Court Huntington, New York 11743, USA

Tel: (516)480-2000 Fax: (516)349-7906 E-Mail: [plavi3621@gmail.com](mailto:plavi3621@gmail.com)

---

November 9, 2022

Honorable Vernon S. Broderick  
United States District Judge  
500 Pearl Avenue  
New York, NY 10007

Dear Honorable Judge Broderick,

In reference to your kind telephone conversation on October 28, 2022, I respectfully request for you to kindly note the following:

#### Nature of Action

This is an action to recover the balance of the money which my company, Turbo Dynamics Corporation, has already shipped to BNI in Jakarta, Indonesia and by criminal action of BNI towards JP Morgan Chase Bank has not been paid. For your Honor's information fraud against any financial institution in the United States of America is not subject to any limitation of time. The email of BNI to Chase was dated December 6, 2011 but based on the attached document will not be subject to any statute of limitation. Moreover, due to the fact that BNI did not send us the amount of \$411,600 in a timely manner, I was obliged to sell my property known as 150 Express Street located in Plainview, NY 11803 which undersigned has had as a manufacturing company for gas turbines which was established in June 1974. Simply because we could not pay the rent for almost two years, we were forced to sell the building and put the machinery and stock parts in two different storage facilities which I am the only party responsible for the rent every month.

#### Jurisdiction Statement

In my humble opinion, your Honorable Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. 1332(A)(2) as citizen of New York and all Defendants are citizens of New York or Foreign State. BNI is subject to personal jurisdiction in New York pursuant to NY CPLR 302(A)(1)(2) and or (3). Defendant BNI is subject to jurisdiction in New York pursuant to CLPR 301 because BNI is located in New York City as well.

#### Factual Background

Due to the fact that BNI did not transfer the money owed to us \$411,600 on a timely manner we were obliged to sell our warehouse and since then we are out of business. For this reason, your Honor will decide the amount due to undersigned by BNI in New York City.

With your permission, I am attaching herewith enclosed the statement which has been sent to my accountant confirming that my younger brother Jamshid Lavi and Mansour Lavi have no interest in the ownership of Turbo Dynamics Corporation.

Therefore I am the only one who has the right to bring forth a claim against BNI in New York City which should be kindly noted,

Respectfully submitted,

Pierre Lavi

Attached:

Confirmation that Jamshid Lavi does not have ownership of Turbo Dynamics



Pierre Lavi &lt;plavi3621@gmail.com&gt;

# Re: Settlement of my account with you with you mansour and tdc

4 messages

Turbo Dynamics &lt;turbodyncorp@gmail.com&gt;

Sun, Sep 13, 2020 at 5:27 PM

To: "J. Lavi" &lt;jlavi85@gmail.com&gt;

Dear brother

In order to reply to your email pls be kind enough

In sending me copies of what we signed at

The office of mr Spitzer several months ago

As I could not find the file

Tks

P lavi

Sent from my iPhone

*Statement of  
Jamshid Lavi  
Confirming he has no  
Share or interest  
in Turbo Dynamics  
Corporation*

On Sep 12, 2020, at 15:49, J. Lavi &lt;jlavi85@gmail.com&gt; wrote:

Noted.

Do please convey my agreement as to above to the firm of Ambrosio & Bellotti, the TDC accountant, and the fact that I am surrendering my entire 20% (nine (9) percent were transferred to Amir) shares of TDC to the Corporation.

This agreement by undersigned is subject and means that from this point on forward, you, Pierre Lavi alone as well as your heirs, undertake and indemnify and release me from any action, suits, debts, claims, demands, account reckonings, Judgments, contracts, damages whatsoever initiated by any individual, United States entities, Any United State Governmental Organizations, and or any foreign Governmental Organizations and or entities.

As well please note that as recently via email, I have brought to your attention that I am in dire need of balance of a loan that on your behalf and direction, on or about July of 2010, I paid to Angella Motehadeh.

Please confirm your agreement as outlined above to me via return email.

FYI, the content of this email is being copied to Mr. Hardy as well.

Jamshid

On Fri, Sep 11, 2020 at 11:42 AM Turbo Dynamics <turbodyncorp@gmail.com> wrote:

I had carried this company since it's foundation

Provided not only services but by

Many million dollars as investment or shortfall

Of my money . Turbo dynamics corporation

Owes me many million of dollars which I should

Receive . There are still some inventory as well

As some machineries available which I shall sell and keep the money which I had spent and put into the business of turbo dynamics corporation , omega industries INC. Omega

International. , western dynamics INC western

Dynamic international Etc.t

To avoid any misunderstanding I need yours

As well As mansour lavi full confirmation to

My statement , when confirmed pls send the email copy to mr Jon Hardy our accountant